

UNITED STATES DISTRICT COURT

<u>Ralph R. Nelson</u>	:	DOCKET NO.
Plaintiff	:	
	:	04-10845 GAO
vs.	:	
	:	
<u>Tonya M. Nelson</u>	:	<u>ANSWER TO</u>
Defendant	:	<u>COMPLAINT</u>

COMES NOW, the defendant Tonya Nelson in answer to the plaintiff's Complaint, and states as follows:

Parties:

1. Defendant denies, for lack of knowledge where Plaintiff lives.
2. Defendant admits this is her address.

Facts:

1. Defendant adamantly denies each and every allegation set forth in this "alleged" complaint. Ralph Nelson was and still is abusive, there is a domestic violence restraining order Case No. DV-94-265 in the Common Pleas Court of Montgomery County, Ohio filed on September 30, 1994.
5. Defendant denies child support that the Plaintiff claims, Case No. 99-DR-0989 in the Court Of Common Pleas, Clark County, Ohio filed on December 7, 1999 with final decree on May 5, 2000 calculates child support.

FIRST AFFIRMATIVE DEFENSE:

Plaintiff is barred by the Statute of Limitations.

SECOND AFFIRMATIVE DEFENSE:

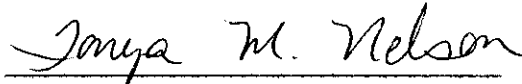
Plaintiff has failed to mitigate his damages and exhaust his remedies in the proper place and jurisdiction.

THIRD AFFIRMATIVE DEFENSE:

Plaintiff has failed to make any claim upon which relief may be granted.

WHEREFORE, the Defendant having fully answered the Complaint herein demands that this Complaint be dismissed with prejudice, for costs and fees Defendant has to expend in defending such frivolous and outrageous claim, for any and all other relief to which Defendant may be entitled.

Respectfully signed,

A handwritten signature in cursive script that reads "Tonya M. Nelson". The signature is written in black ink and is positioned above a horizontal line.

Tonya M. Nelson
3316 Bristol Drive
Springfield, Ohio 45503
(937) 629-0093

SAO 440 (Rev. 8/01) Summons in a Civil Action

UNITED STATES DISTRICT COURT

District of

RALPH R. NELSON

v.

SUMMONS IN A CIVIL ACTION

04 10845 GAO

TONYA MARIE COFFEY (NELSON)
ET AL

CASE NUMBER:

TO: (Name and address of Defendant)

TONYA MARIE COFFEY (NELSON)
3316 BRISTOL DRIVE
SPRINGFIELD, OHIO 45503

YOU ARE HEREBY SUMMONED and required to serve on PLAINTIFF'S ATTORNEY (name and address)

RALPH R. NELSON
57 CHARTER STREET
APT 2A
BOSTON, MA 02113

*Served on
5-14-04*

an answer to the complaint which is served on you with this summons, within 20 days after service of this summons on you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Any answer that you serve on the parties to this action must be filed with the Clerk of this Court within a reasonable period of time after service.

TONY ANASTAS

CLERK

(By) DEPUTY CLERK



APR 28 2004

DATE